# UNITED STATES BANKRUPTCY COURT DISTRICT OF NORTH DAKOTA

In Re:	Case No.: 7
Pro-Mark Services, Inc.,	Chapter 24-30167
Debtor.	

# CAPITAL CREDIT UNION'S JOINDER TO TRUSTEE'S RESPONSE IN OPPOSITION TO MOTION OF MIGUEL PAREDES FOR ORDER EXTENDING TIME TO FILE A PROOF OF CLAIM

Capital Credit Union ("<u>CCU</u>"), a creditor, by and through the undersigned counsel, hereby opposes the Motion of Miguel Paredes for Order Extending Time to File Proof of Claim [ECF #237] (the "Motion"), as follows:

#### **LAW AND ARGUMENT**

- 1. CCU hereby incorporates herein and joins in the arguments made in Trustee's Response in Opposition to Motion of Miguel Paredes for Order Extending Time to File a Proof of Claim.
- 2. Because Miguel Parades had actual and/or constructive notice of the bar date prior to the deadline, Miguel Parades is not entitled to relief under Bankruptcy Rule 3002(c)(7). WHEREFORE, CCU requests an order as follows:
  - 1. Denying the Motion.

Dated this 5<sup>th</sup> day of September, 2025.

### **VOGEL LAW FIRM**

## BY:/s/ Drew J. Hushka

Caren W. Stanley (#06100)
cstanley@vogellaw.com
Drew J. Hushka (#08230)
dhushka@vogellaw.com
218 NP Avenue
PO Box 1389
Fargo, ND 58107-1389
701.237.6983
ATTORNEYS FOR CAPITAL CREDIT
UNION